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12 UBER TECHNOLOGIES, INC.,
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13

14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
17 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

18 This Document Relates to:

19 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
20 3:23-CV-06708
21

**STIPULATION AND [PROPOSED]
ORDER TO PERMIT PROVISIONALLY
FILING UNDER SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

22 WHEREAS, on December 18, 2025, the Court entered a Stipulation and Order to extend
23 the deadline for Uber to file its response to Plaintiff's Administrative Motion to consider whether
24 the exhibits to Plaintiff's Omnibus Motions in Limine should be sealed until January 6, 2026. ECF
25 4722.

26 WHEREAS, on December 30, 2025, Uber will file its opposition to Plaintiff's Omnibus
27 Motions in Limine ("Uber MIL Opposition").

28 WHEREAS, the parties agree that Uber should be permitted to file the exhibits to Uber's
STIPULATION TO PERMIT PROVISIONAL FILING
UNDER SEAL

MIL Opposition provisionally under seal so that, for the convenience of both the parties and the Court, Uber can address the sealing of all of the motion in limine materials on January 6, 2026.

WHEREAS, the parties therefore agree that Uber's motion to seal the exhibits to Uber's MIL Opposition should be due on January 6, 2026.

WHEREAS, the Court has extended other deadlines in the case, but not this one.

WHEREAS, the requested extension will have no bearing of the rest of the case schedule.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation permitting Uber to file the exhibits to Uber's MIL Opposition provisionally under seal and extending Uber's deadline to file its motion to seal those exhibits until January 6, 2026.

IT IS SO STIPULATED.

DATED: December 19, 2025

Respectfully submitted,

By: /s/ Laura Vartain Horn

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Dated: December 19, 2025

/s/ Andrew R. Kaufman

ANDREW R. KAUFMAN (*Admitted Pro Hac Vice*)

STIPULATION TO PERMIT PROVISIONAL FILING
UNDER SEAL

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 19, 2025

/s/ Laura Vartain Horn
Laura Vartain Horn

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: December __, 2025

Honorable Charles R. Breyer
United States District Judge